

EXHIBIT 29

SEAN SHEFFER
5/18/2021

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

HUNTERS CAPITAL, LLC, et al.,)
)
Plaintiffs,)
)
vs.) No. 20-cv-00983-TSZ
)
CITY OF SEATTLE,)
)
Defendant.)

Zoom Video Deposition Upon Oral Examination

of
SEAN SHEFFER
Shuffle LLC 30(b)6

*** Contains Confidential Testimony and Exhibits ***

DATE: Tuesday, May 18, 2021

REPORTED BY: Mindy L. Suurs, CSR No. 2195

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1 when?

2 A. I see the -- I see your question. It was
3 located -- Cure Cocktail was located 1641 Nagle Place in
4 2017 and it was located there until the end of the lease in
5 the end of -- in March 2021.

6 Q. Okay. So Cure Cocktail maintained its storefront
7 at 1641 Nagle Place until March 2021?

8 A. Correct. It still stands there this day.

9 Q. But it's no longer open there?

10 A. It's closed.

11 Q. It's closed, okay. Now, you mentioned that Cure
12 Cocktail is currently located at 1449 East Pine; right?

13 A. The trade name, yes.

14 Q. What do you mean?

15 A. When you file for Shuffle LLC, you can have
16 dba's, so the trade names are Cure Cocktail and Remedium
17 Grill.

18 Q. So you purchased Cure, and you also owned the
19 trade name Cure; is that right?

20 A. We actually purchased the trade name, the rights
21 to the trade name. So the Haldane Group had Cure --
22 Haldane Group LLC had a dba and trade name registered as
23 Cure. After I bought it, they released that trade name and
24 Shuffle LLC was able to put Cure as their trade name.

25 Q. Now, you mentioned Cure Cocktail. Is that a

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1 A. No.

2 Q. And to the best of your knowledge, neither did
3 any of your employees?

4 A. No.

5 Q. You did have interaction with a City of Seattle
6 police officer in December of 2020; right?

7 A. Yes.

8 Q. Okay. Having reminded you of that, are there any
9 other instances where you can remember having direct
10 communication with a City of Seattle employee?

11 A. No.

12 Q. Okay. So are there any statements from the City
13 of Seattle or its employees or its representatives that you
14 have relied on related to this lawsuit?

15 A. No.

16 Q. While the CHOP was in effect or -- I'm going to
17 withdraw that.

18 Between June and July 1st of 2020, were there any
19 instances where access to Nagle Street location was
20 physically blocked?

21 MR. WEAVER: Objection. Answer if you can.

22 A. No.

23 BY MS. PRATT:

24 Q. And you talked earlier about blocks to access to
25 Nagle Street that were by police lines, but those were in

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1 REPORTER'S CERTIFICATE
2

3 I, Mindy L. Suurs, the undersigned Certified Court
4 Reporter, pursuant to RCW 5.28.010, authorized to
administer oaths and affirmations in and for the State of
Washington, do hereby certify:

6 That the foregoing testimony of SEAN SHEFFER was
given before me at the time and place stated therein and
thereafter was transcribed under my direction;

8 That the sworn testimony and/or proceedings were by me
stenographically recorded and transcribed under my
9 supervision, to the best of my ability;

10 That the foregoing transcript contains a full, true,
and accurate record of all the sworn testimony and/or
proceedings given and occurring at the time and place
stated in the transcript;

12 That the witness, before examination, was by me duly
sworn to testify the truth, the whole truth, and nothing
but the truth;

14 That I am not a relative, employee, attorney, or
counsel of any party to this action or relative or employee
of any such attorney or counsel and that I am not
financially interested in the said action or the outcome
thereof;

18 DATE: May 23, 2021

22 *Mindy L. Suurs*

23 Mindy L. Suurs
Certified Court Reporter #2195

